

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Jane Doe 1, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

JPMorgan Chase Bank, N.A.,

Defendant.

Case No. 1:22-CV-10019 (JSR)  
**(Consolidated for Discovery Purposes  
with 1:22-cv-10018-JSR  
and 1:22-cv-10904-JSR)**

**DECLARATION OF DEAN M. KAIRES IN SUPPORT OF APPLICATION FOR  
ADMISSION *PRO HAC VICE***

I, DEAN M. KAIRES, hereby declare as follows:

1. I have never been convicted of a felony.
2. I have never been censured, suspended, disbarred or denied admission or readmission by any court.
3. There are no pending disciplinary proceedings against me in any state or federal court.
4. I am a member in good standing of the bar of the State of Florida.

I hereby declare under penalty of perjury that the foregoing statements are true and correct.

Dated: May 26, 2023  
Fort Lauderdale, FL

Respectfully submitted,

/s/ Dean M. Kaire  
Dean M. Kaire  
*Pro Hac Vice*  
Edwards Henderson Lehrman  
425 North Andrews Avenue  
Suite 2  
Fort Lauderdale, FL 33301  
Dean@epllc.com  
*Attorney for Plaintiff, Jane Doe 1*